Amendments to the Drawings

The attached 2 sheets of drawings include changes to Figs. 1 and 2.

Attachment: Replacement Sheets 1 and 2.

Remarks/Arguments

Claims 1-5, 8-10 and 12-17 are pending. The claims have been amended to more clearly and distinctly claim the subject matter that applicants regard as their invention. No new matter is believed to be added by the present amendment.

Objection to the Drawings

Responsive to the objection to the drawings, applicants submit herewith corrected Figs. 1 and 2 on the attached 2 sheets, wherein reference numerals 100 and 200 have been added to Figs. 1 and 2, respectively.

Objection to the Specification

Responsive to the objection to the specification, the title has been amended to read "Method and Apparatus for Using an IC to Facilitate Downloading Content."

Objection to claim 7 under 35 USC 112, second paragraph

Claim 7 has been amended to recite "... decrypting an encrypted part of the content ..." Applicants submit that the objection has been overcome in view of the amendment.

Rejection of claims 1-11 under 35 USC 102(e) as being anticipated by Chan et al. (US Pat No 6233683)

Applicants submit that for the reasons discussed below Chan fails to disclose each and every limitation of amended claims 1 and 10, and as such, these claims, and the claims that depend therefrom, are not anticipated by Chan.

Amended claim 1 recites:

> receiving content broadcast from a server;
> **verifying that an entitlement contained in the integrated circuit card is correct for receiving the content**;
> receiving the reusable content from the server via the terminal in response to the verification;
> **storing the reusable content in response to the verification**, and
> **verifying that the entitlement is correct for reuse when reuse of the content is attempted**. (emphasis added)

Applicants submit that Chan fails to disclose or suggest at least the above-emphasized limitations of amended claim 1.

Chan discloses a system that enables a smart card to download new applications in a secure fashion by using a security domain that is loaded onto the smart card. The security domain is a logical construct that can be implemented as an application, and which works with applications of the card domain to provide security related functions to the card domain (abstract, col. 6, lines 62-66). In particular, the security domain manages signing and decrypting keys and provides cryptographic services using those keys (col. 7, lines 51-65). The security domain can be loaded onto the smart card before or after the smart card is issued (col. 8, lines 28-54). Once loaded, the security domain provides the security functions mentioned above.

In this regard, the security domain functions to check a signature for an application to ensure that the application is from a correct source, and then provides the cryptographic services once the source is authenticated (col. 7, lines 55-58). However, nowhere does Chan disclose or suggest **verifying that the entitlement information** contained in the card is correct for receiving the content. Rather, the security domain operates to **confirm the signature** associated with new application to be loaded onto the smart card, and provides the necessary functions for decrypting the new application. That is, Chan discloses verifying the source of the new application, but says nothing about **verifying entitlement information** on the smart card to determine whether the smart card is entitled to receive, store and reuse the downloaded content.

The portions of Chan cited by the Office Action fail to disclose or suggest the above-emphasized limitations of amended claim 1. Col. 3, lines 38-45 discuss providing first and second applications to a smart card, wherein the cryptographic service of the first application is used to load the second application. Col. 12, lines 14-53 describe the method shown in Figs. 12A and 12B, in which a trusted agent is used in generating and sending cryptographic keys to the smart card for verification and processing of the new application. Again, in this scenario, the security domain is invoked to verify the signature associated with the application and provide cryptographic services (col. 12, lines 41-44). Clearly, none of the cited portions of Chan disclose or suggest **verifying an entitlement contained in the**

smart card, and "... receiving the reusable content from the server via the terminal in response to the verification; storing the reusable content in response to the verification, and verifying that the entitlement is correct for reuse when reuse of the content is attempted..." as recited in amended claim 1.

In view of the above, applicants submit that Chan fails to disclose or suggest each and every limitation of amended claim 1, and as such, amended claim 1, and claims 2-5 and 7-9, are not anticipated by Chan.

Amended claim 10 and new claim 14 recite the above-mentioned limitations of claim 1 in apparatus form, and as such, applicants submit that claims 10 and 14, and the claims that depend therefrom, are not anticipated by Chan for at least the same reasons as those discussed above with respect to amended claim 1.

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,
Weaver, et al.

By: Paul P. Kiel
Attorney for Applicants
Registration No. 40,677

THOMSON Licensing Inc.
PO Box 5312
Princeton, NJ 08543-5312

Date: 2/13/06

CERTIFICATE OF MAILING

I hereby certify that this amendment is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, Alexandria, Virginia, 22313-1450 on:

2/14/06
Date

Linda Tindall
Linda Tindall